

EXHIBIT B

1 I think you said a clear tension between the executive
2 branch and the police department.

3 A. Yes.

4 Q. Is that right?

5 A. Yes.

6 Q. Can you describe what you're referring to?

7 A. Chris Coons and Dave Singleton and Lynn Howard
8 and Nicole Majeski made it very clear that they were
9 not happy with how things were going in the police
10 department. They were not happy with the chief, and
11 frequently that they were not happy with Trini. And
12 there was an active investigation into the police
13 department from the time I started, pretty much.
14 There was also the hiring of the public safety
15 director, Guy Sapp.

16 Q. What was your understanding, if any, as to the
17 role of Sapp with regard to the police department?

18 A. He was supposed to clean it up.

19 Q. Was he supposed to run it as well?

20 A. I don't know.

21 Q. And how was he supposed to clean it up?

22 A. I don't know.

23 Q. Was he supposed to get rid of the chief?

24 A. Yes.



1 Q. And were there any plans put forth as to how
2 they would get rid of the chief?

3 A. They were trying to solidify information that
4 showed he was doing things wrong.

5 Q. Now, when you say "they," let's be clear. This
6 is the core group, meaning Coons and the four or five
7 other people that you mentioned?

8 A. Yes, it was primarily Chris, Dave Silverman,
9 and Guy Sapp, I believe, were the primary ones working
10 on that.

11 Q. Dave Silverman?

12 A. Singleton.

13 Q. I'm sorry.

14 A. Excuse me.

15 Q. That's what I thought you -- okay. I'm sorry,
16 Allison, you said that they were trying to solidify
17 something, and I'm not quite sure what you meant by
18 that.

19 A. They had information about, or I heard them say
20 they had information about the chief's wrongdoing, and
21 they were reviewing the information to determine
22 whether it was enough information to justify
23 terminating his employment and whether it would stand
24 up to council, before council.



1 Q. What was your understanding, if any, as to what
2 the specific allegations of wrongdoing were?

3 A. I didn't have much information about that.
4 What I heard was talk about the pay jobs fund, which I
5 don't fully understand, but it had to do with officers
6 who were paid to do jobs outside of their regular
7 duties, like directing traffic at parades and church
8 functions.

9 Q. That was your understanding as to what they
10 were talking about?

11 A. Yes.

12 Q. Did you have a further understanding that there
13 was an issue regarding an alleged DELJIS violation?

14 A. Yes, I did hear about that.

15 Q. And was this another of the grounds that they
16 were using to -- they were looking at in order to
17 terminate the chief's employment?

18 A. I don't really know.

19 Q. All right, a moment ago when I asked you about
20 what the core group was doing, you said they were not
21 happy with the chief. We've explored some of that.
22 You said also that they were not happy with, or words
23 to that effect, I think, with Trinidad Navarro. Is
24 that fair to say?



1 A. Correct.

2 Q. Okay. Can you tell me why, what their
3 reasoning was for not being happy with Corporal
4 Navarro?

5 A. I didn't really understand all the reasons. I
6 often said to Chris, "When there's too much going on,
7 Trini is one of the few people I can ask for help and
8 count on to get something done."

9 Q. What kind of response, if any, did Chris give
10 you?

11 A. I don't remember.

12 Q. Did it appear that Chris, like the others, was
13 upset with Trini Navarro?

14 A. Yes. They believed that he had been involved
15 in criminal activities.

16 Q. That Corporal Navarro was involved in criminal
17 activities?

18 A. Yes.

19 Q. Can you be more specific?

20 A. They believed that he had been involved with
21 campaigning on county time.

22 Q. And this campaigning, was this the campaign
23 that resulted in the election of Chris Coons?

24 A. I don't know. I don't know.



1 Q. How many times did you have an opportunity to
2 speak with Chris Coons about Trini Navarro?

3 A. I don't remember.

4 Q. More than a few times?

5 A. A handful probably.

6 Q. During that time, do you recall that Chris
7 Coons ever said anything positive about Trini Navarro?

8 A. I don't remember.

9 Q. Do you recall anything that Chris Coons told
10 you about Trinidad Navarro?

11 A. He was upset on an occasion when Trini didn't
12 tell us about some media contact.

13 Q. Was that the media contact with Cris Barrish at
14 the *News Journal*?

15 A. I don't remember. There were several things
16 that came up. I don't remember what he specifically
17 talked about.

18 Q. You said "there were several things that came
19 up." What do you mean by that?

20 A. There were a couple of specific media items.
21 One was the story about the chief in *Delaware Today*.
22 There was a story about a crossing guard, Elsie or
23 Elise Poore, P-o-o-r-e, in which the chief was quoted,
24 and the Cris Barrish contact.



1 Q. A moment ago you said that several things came
2 up. Were you suggesting they came up at one time or
3 over a course of your conversations with Chris Coons?

4 A. I don't remember.

5 Q. You believe that Chris Coons was not happy with
6 Trini Navarro?

7 A. Yes.

8 Q. Is there any question in your mind about that?

9 A. No.

10 Q. We've been going about an hour. Would you like
11 to take a break now or keep on going for a little bit?

12 A. No, I'm happy.

13 Q. Okay. Do you recall calling Corporal Navarro
14 following a report about the colonel having an article
15 in *Delaware Today*?

16 A. I don't remember it being -- I don't remember
17 specifically calling him on that specific issue alone.

18 Q. Okay. What do you recall? Apparently you
19 recall calling him about some issues. Is that fair to
20 say?

21 A. I remember calling him about those three
22 stories that I mentioned, because Chris was upset, and
23 I had asked Trini several times verbally and in
24 writing to let me know about media contact, or



1 said, "Could you just tell me personally, you know, if
2 it's not true, tell me it's not true and I'll believe
3 you and we'll put it away. I'll never worry about it
4 again."

5 And he said it was not true. I told him I
6 wanted to trust him and that there were just these
7 things floating around out there that I wanted to know
8 the answer to.

9 Q. When you and Trini talked about the process for
10 selecting a sergeant and the process for having
11 openings, do you recall making a statement to the
12 effect that, "Well, that's how politics works"?

13 A. I don't remember making that statement in that
14 context. I may have used that turn of phrase, but I
15 don't believe that politics plays a role in the
16 promotion process, so I don't think I would have said
17 that in that context.

18 Q. Do you recall telling Trini at the time you met
19 at the Dunkin' Donuts that you had several
20 conversations with chief -- or the county executive
21 and that you had told Chris Coons that Trini is one of
22 the few people who you can depend upon to get the job
23 done?

24 A. Yes.



1 this coming." And I said, "I thought so, but I was
2 hoping you might recognize that I was set up, and that
3 there would be another way we could work this out."

4 And they said, "We understand you were
5 definitely set up." And they said, "Would you give us
6 a letter of resignation?" And I said okay. And this
7 took place in Dave Singleton's office. They offered,
8 since Chris Coons wasn't there, they offered to let me
9 sit in Chris's room, office for a few minutes, which I
10 did. And then I went and packed my stuff and I, I
11 believe I copied files to give to Tom Mitten, my
12 assistant, so that they would have the items they
13 needed.

14 And I packed up and I left. And I did
15 give them a resignation letter, although I was still
16 able later to collect unemployment because it was a
17 forced resignation.

18 Q. All right. What did you mean by saying you had
19 hoped that they would have recognized that you were
20 set up?

21 A. Well, I think that Trini pointedly asked me to
22 come to Dunkin' Donuts so that he could get me to say
23 things that would give him fodder for a lawsuit. I
24 don't think he particularly had any interest in



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1 getting me fired or not. I think it was simply a
2 matter of getting material for a lawsuit.

3 Q. And there was an acknowledgment, was it by Dave
4 Singleton who agreed that he felt that you were set
5 up?

6 A. Yes, and Lynn Howard also. They both made
7 comments to that effect.

8 Q. And did you understand that to mean, what you
9 interpreted this, that you were set up because Trini
10 asked you to come to Dunkin' Donuts to get information
11 for a lawsuit?

12 A. Yes.

13 Q. Do you have any understanding as to anybody who
14 was directing Trini Navarro, or was he acting on his
15 own?

16 A. I don't know.

17 Q. Since your departure, have you been cooperating
18 with the county?

19 MS. SANFRANCISCO: I object to the form of
20 the question.

21 Q. Are you being represented by the county?

22 A. Yes.

23 Q. Okay. So you've had an opportunity to meet
24 with the county attorneys to prepare for this



1 A. Possibly. I don't remember specifically, but I
2 remember that sense of it, that the PIO position is
3 clearly a high-profile position which puts you more in
4 the political limelight. You know, Trini's on the TV
5 and in the paper pretty much every day. It's a highly
6 visible position. And to be on patrol is less
7 visible, and would probably garner him less attention
8 from the politicians.

9 Q. Is there, in your view, I mean your whole
10 career has been on the media side and then on the
11 government communications side, is there a certain
12 element of political involvement of politics, with a
13 small "p," in being a public information officer,
14 being the face of a government headed by someone who's
15 run for elective office?

16 MR. MARTIN: Objection. You may answer.

17 A. Yes, whether it's working directly for the
18 politician or not, yes. Because everything that goes
19 into the media reflects on the organization or agency,
20 and if it's led by a politician, it certainly has an
21 impact on that politician.

22 Q. I'm just going to touch back on a line of
23 questioning that Mr. Martin asked you, and I think
24 your answer was you didn't recall, and maybe just



1 asking might jog it a little bit.

2 Did Mr. Navarro ever explain to you in any
3 words, as you recall, an explanation as to, "Well,
4 even if you don't get the next promotion, you'll get a
5 further promotion, you have a shot at a further
6 promotion," and he responded negatively to that. Do
7 you remember any of the words he said about that,
8 about why his chances were so bad if he didn't get
9 this one shot, his chances were so bad?

10 A. I think it had something to do with the test
11 scores were only good for so long, but I don't
12 remember specifically. There was some reason that he
13 wouldn't be eligible after that particular cycle.

14 Q. Okay. And he thought the African-American, by
15 virtue of having the African-American gentleman, by
16 virtue of having been passed over, would probably get
17 the next available spot?

18 A. By virtue of being African-American and by
19 virtue of being passed over.

20 Q. And that had nothing to do with any
21 anti-Navarro sentiments on the part of the executive
22 office, correct?

23 A. I don't think so.

24 Q. Did he attribute it to that, that he would



1 appoint the African-American because they don't like
2 me?

3 A. No, no.

4 Q. Okay. How about his, let's say, pessimistic
5 assessment of his chances going forward to get the
6 remaining, any further promotions before that list
7 expired. Did he say that anyone had it in for him,
8 that he'd never get another position, another shot at
9 a promotion because of that?

10 A. I don't remember him saying that.

11 Q. So the matter of the reduction in promotional
12 opportunities and the curtailing of his chance, we'll
13 say, or his pessimistic assessment of his chances to
14 get a promotion, did he ever ascribe that to any
15 negative sentiments by Coons or Singleton or Sapp? Or
16 was promotion a separate topic?

17 A. I don't remember him attributing it to anybody
18 in the administration.

19 Q. More to how the system works, he would
20 attribute it more to how the system works?

21 A. Yes. And that reminds me, the phrase about
22 "that's how politics works," that -- when I said that,
23 I was referring to the change in the number of
24 sergeant positions, because what I was attempting to



1 say was that the number of sergeants needed had
2 changed. The administration decided fewer sergeants
3 were needed because they wanted more patrolmen to stay
4 on, and there was -- because there was a change in the
5 administration, there was a change in the number of
6 sergeants required from a policy point of view.

7 Q. Was there also -- you may have been involved in
8 this, in some measure of this or the handling of it.
9 Wasn't there a lawsuit pending when Mr. Coons took
10 office brought by a civic activist named Korn, maybe
11 Richard Korn, who was attacking the whole county
12 financial structure, that this whole large surplus
13 built up would have to be spent, and if he had won his
14 lawsuit, I mean the county was really in for difficult
15 financial times?

16 A. I don't know if that was still pending at this
17 time. And I don't know if it had any relation to the
18 promotion process. I do know that the case existed.

19 Q. You were asked whether Chris Coons had ever
20 told you that, "Corporal Navarro will never be
21 promoted so long as I'm executive or never be
22 promoted," and you said he had never told you that.

23 A. He never told me that.

24 Q. And I should have objected to the question as



1 to the effect that a fewer number of sergeants were
2 needed, instead they wanted to increase the number of
3 patrolmen, men on the street, or police officers on
4 the street. Is that --

5 A. I think that was what it was.

6 Q. All right. Do you know from whence that came?
7 Was this county policy or --

8 A. I don't remember.

9 Q. But you heard this during your tenure as the --
10 at the county you heard them, you heard somebody say
11 that this is what they wanted to do, increase the
12 number of patrol officers on the street and therefore
13 fewer number of sergeants would be needed?

14 A. I believe so.

15 Q. Okay.

16 A. That was my, my general understanding.

17 Q. Okay.

18 A. Of why the number of sergeant positions was
19 reduced.

20 Q. All right. And the time period was at the end
21 of the fiscal year going into fiscal year, or the new
22 fiscal year July 1?

23 A. I don't really recall the specific timing.

24 Q. Okay. You also reference some meetings with

